

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,	)	CASE NO. 1:19-cv-145
	)	
Plaintiff,	)	JUDGE DAN AARON POLSTER
	)	
v.	)	MAGISTRATE JUDGE
	)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO,	)	
LLC, <i>et. al.</i> ,	)	
	)	
Defendants.	)	

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RECEIVER'S SUPPLEMENTAL REPORT REGARDING GEORGIA  
CAMPUS RECORD ISSUE [DOC. 421]

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Mark E. Dottore, (the “**Receiver**”) duly appointed and acting Receiver of Dream Center Education Holdings LLC (“**DCEH**”), Argosy University of California LLC (“**Argosy California**”), and Argosy Education Group LLC (“**Argosy University**”), submits the following in accordance with this Court’s Order of August 31, 2019 [Doc. 421].

Hilco informed the Receiver that the buyer of the contents of the room on the first floor of the Georgia School of Professional Psychology, which room included the student training files that were destroyed, was Marvin Hudson, of HMB Army/Navy Store, 1831 Harland Drive, Fort Walton Beach, Florida. Security records show that Mr. Hudson entered the building on a single day - April 7, 2019 - to recover the property the bought at the auction, including the contents of the room that contained the student training files. The Receiver understands that the documents were likely destroyed on or about April 7. The Receiver’s office first learned of the

record retention issue on April 16, 2019, when the movers arrived to retrieve the files, but instead found an empty room.

Stating further, the Receiver has learned that the training records at issue may not have the importance the student intervenors have claimed. Georgia regulators have informed the Receiver that the students applying for clinical psychology licensure in the state *need not submit to the State their training records*.

The Receiver's office contacted the Georgia Secretary of State on August 26, 2019, and spoke with Ms. Fanetta Ricks, customer service specialist.<sup>1</sup> Ms. Ricks directed the Receiver to the Rules and Regulations of Chapter 510-2 Licensure by Examination, found on the state's website at <http://rules.sos.ga.gov/gac/510-2>.

Ms. Ricks confirmed that applicants for the clinical psychology licensure exam must complete the following forms:

1. Application Initiation Form by Exam, Endorsement of CPQ (attached hereto as Exhibit A);
2. Form A – Internship Verification (attached hereto as Exhibit B);
3. Form – Citizenship Affidavit (attached hereto as Exhibit C); and,
4. Form – Secure & Verifiable Document Cover Sheet (attached hereto as Exhibit D).

These forms are attached here for the convenience of the court and Ms. Milbrandt, Ms. York and Ms. Watts. The forms can also be found at <https://sos.ga.gov/index.php/licensing/plb/44>. The Receiver further submits Exhibit E, which includes the General Instructions for Application of Licensure.

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<sup>1</sup> Ms. Ricks' phone number is (478) 207-2440.

Ms. Ricks confirmed that the Internship Verification Form (Exhibit B), which most closely addresses an applicant's training as it requires certain data regarding an applicant's internship history, does not require that any supporting documents be sent. The completed Internship Verification form requires *only* the signature of the applicant and training director.

Upon receipt of the application documents by the state, applicants will be registered with the Georgia Board of Examiners of Psychologists to begin the application process for licensure. Once this form is reviewed and approved by the state, the applicant's name and contact information will be sent to the Association of State and Provincial Psychology Boards ("ASPPB,") which will guide the applicant through the remainder of the application process.

Dated: September 6, 2019

Respectfully submitted,

/s/ Hugh D. Berkson

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*Special Counsel for the Receiver*

**CERTIFICATE OF SERVICE**

The foregoing was electronically filed this 6<sup>th</sup> day of September, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Hugh D. Berkson

Hugh D. Berkson (0063997)